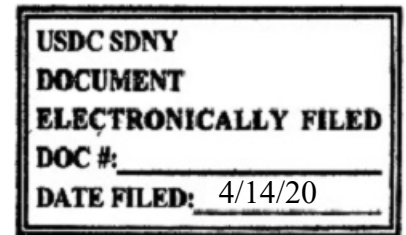


**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**



In re Global Brokerage, Inc. f/k/a FXCM, Inc.
Securities Litigation

Master File No. 1:17-cv-00916-RA-BCM

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER EXTENDING THE BRIEFING
SCHEDULE FOR PLAINTIFFS'
AMENDED MOTION FOR CLASS
CERTIFICATION**

This Document Relates To: All Actions

This Stipulation is entered into between Lead Plaintiffs 683 Capital Partners, LP and Shipco Transport Inc. ("Shipco") and Movant E-Global Trade and Finance Group, Inc. (collectively, "Plaintiffs") and Defendants Global Brokerage, Inc. f/k/a FXCM, Inc., Dror Niv, and William Ahdout (collectively, "Defendants").

WHEREAS, as discussed during the status conference with the Court on April 13, 2020, Shipco's corporate representative will be unable to sit for his deposition as scheduled on April 16, 2020 due to urgent developments affecting Shipco's shipping business in the wake of the COVID-19 pandemic;

WHEREAS, Shipco's corporate representative expects to make himself available for Shipco's deposition by no later than May 22, 2020;

WHEREAS, Plaintiffs filed their Amended Motion for Class Certification and Appointment of Class Representative and Class Counsel ("Amended Motion") on April 9, 2020;

WHEREAS, Defendants' deadline to file their opposition to the Amended Motion is May 8, 2020, and Plaintiffs' deadline to file their reply in support of the Amended Motion is June 22, 2020;

WHEREAS, on February 28, 2020, the parties requested an extension of the briefing deadlines related to the Amended Motion, which was granted by the Court on March 2, 2020;

WHEREAS, on April 2, 2020, the parties requested a second extension of the briefing deadlines related to the Amended Motion, which was granted by the Court on April 6, 2020;

IT IS HEREBY STIPULATED AND AGREED by the undersigned that Defendants' deadline to oppose the Amended Motion is extended to June 12, 2020, and Plaintiffs' deadline to file their reply in support of their Amended Motion is extended to July 27, 2020.

THE ROSEN LAW FIRM, P.A.

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Attorneys for Defendants

SO ORDERED, on this 14 day of April, 2020



No further extensions absent compelling circumstances.

Barbara C. Moses

United States Magistrate Judge